



ALEX E. JONES | Partner

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VIA EMAIL AND REGULAR MAIL

May 1, 2023

Amazon.com, Inc.
c/o Corporation Service Company
MC-CSC1, 300 Deschutes Way SW, Suite 208
Tumwater, WA 98501

Re: Zurn Elkay Water Solutions Corporation DMCA Takedown Notice

Dear Sir or Madam:

The undersigned and the law firm of Kohrman Jackson & Krantz LLP represent Zurn Elkay Water Solutions Corporation ("**Zurn Elkay**"). A number of individuals and/or corporations (collectively, the "**Infringers**") are using Amazon.com to violate Zurn Elkays' copyright and other intellectual property rights in a number of images, text and illustrations via unauthorized access to Amazon Standard Identification Numbers ("**ASINs**").

All of the information you requested in accordance with the Digital Millennium Copyright Act ("DMCA") is included below:

- The name and email addresses of the person submitting this notice, plus any additional contact details: My name and all contact information is provided above. For clarification purposes, my name is Alex Jones, and my email address is aej@kjk.com.
- The rights owner's name, if the notice is submitted by an agent of the rights owner: Zurn Elkay owns the rights to the copyright and/or intellectual property of the products in question.
- Identification of the intellectual property rights asserted: Zurn Elkay provided copyrighted material to Amazon in connection with the ASIN for each of its products, including product descriptions, images, and other documentation regarding the products. Indeed, all of the (i) product descriptions; (ii) text; and (iii) images associated with the ASINs for Zurn Elkay products are Zurn Elkay's copyrighted material.¹ The use of these ASINs by Infringers is a violation of Zurn Elkay's rights in its copyrighted materials.
- Identification of the specific content on Amazon believed to be infringing, by ASIN or URL: The Infringers set forth on the attached Schedule A, listed by storefront name, is

¹ The copyrighted material is not registered, nor is it required to be under the DMCA.

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infringing on the copyrighted material for each ASIN or ASINs associated with such seller.

- Statement that the information in this notice is accurate: Under penalty of perjury, I certify that the information contained in this notice is both true and accurate.
- Statement that the submitter is authorized to act on behalf of the rights owner and has a good-faith belief that the use of the content is not authorized by the rights owner, its agent, or the law: I have the authority to act on behalf of the owner of the copyrights involved and am providing this notice in good faith, with the reasonable belief that rights Zurn Elkay owns are being infringed.

This letter acts as the official notification under Section 512(c) of the DMCA, and, on behalf of our client, we seek the removal of the listings by the Infringers for each of the ASINs listed above. **We further request that you immediately give notice to the Infringers of this notification, inform them of their duty to remove the listings immediately, and notify them to cease any further unauthorized posting of sales on Amazon.com in the future.**

The law requires you, as a service provider, to disable access to the infringing materials upon receiving this notice. Under U.S. law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If service providers do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright infringement action you will need to investigate and immediately remove or otherwise disable access to these ASINs by the Infringers and remove their postings with all due speed should the direct infringer not comply immediately.

In addition, please preserve all documents, including electronically stored information, relating to the sellers listed above, including, without limitation, all personally-identifying information pertaining to these sellers and all transaction records associated with these accounts.

FOR THE AVOIDANCE OF DOUBT, WE HEREBY DEMAND THE IMMEDIATE REMOVAL OF THE INFRINGERS' LISTINGS.

THIS LETTER DOES NOT PURPORT TO BE A COMPLETE STATEMENT OF THE LAW, THE FACTS, OUR CLIENT'S RIGHTS OR POTENTIAL CLAIMS AND IS WITHOUT PREJUDICE TO ITS LEGAL AND EQUITABLE RIGHTS, ALL OF WHICH ARE EXPRESSLY RESERVED.

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If there are any further questions regarding this urgent matter, I am reachable as noted above.

Sincerely,

Alex E. Jones, Esq.

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SCHEDULE A

Seller Name	Seller ID	ASIN	Weblink
Faucets and More	A4CNSPXWOC6X9	B001DEN91E	https://www.amazon.com/Elkay-EZS8L-Non-Filtered-Cooler-Granite/dp/B001DEN91E/ref=sr_1_2?keyword=s=elkay&m=A4CNSPXWOC6X9&qid=1682530262&s=merchant-items&sr=1-2
Flow Home	A1MYOIS73CRSNF	B00BLXQ4HS	https://www.amazon.com/Elkay-98734C-Kit-Ez-Front-Side-Pushbars/dp/B00BLXQ4HS/ref=sr_1_1?keywords=elkay&m=A1MYOIS73CRSNF&qid=1682530405&s=merchant-items&sr=1-1&th=1
SEKEGE	A3QTFHERA9T9K	B007PB3NF6	https://www.amazon.com/Zurn-Q5PC300XBLUE-Potable-Non-Barrier-Diameter/dp/B007PB3NF6/ref=sr_1_2?keywords=zurn&m=A3QTFHERA9T9K&qid=1682449838&s=merchant-items&sr=1-2&th=1
Overstock	A11OO2OHZG4UKY	B00VQKI3FW	https://www.amazon.com/Elkay-Quartz-Classic-ELG13322BK0-Single/dp/B00VQKI3FW/ref=sr_1_1?keywords=Elkay&m=A11OO2OHZG4UKY&qid=1682530506&s=merchant-items&sr=1-1&th=1
GrandTrine~	A1QC6LX02Z0BFX	B007PB3NF6	https://www.amazon.com/Zurn-ZERK-C-WS1-TM-AquaSense-flush-valves-Chrome/dp/B007PB3NF6/ref=sr_1_1?keywords=zurn&m=A1QC6LX02Z0BFX&qid=1682449933&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.f5122f16-c3e8-4386-bf32-63e904010ad0
Second Wind Sales	A3783Z2AA1DF98	B007PB3NF6	https://www.amazon.com/Zurn-Pex-QE44T-Elbow-Connector/dp/B007PB3NF6/ref=sr_1_1?keywords=zurn&m=A3783Z2AA1DF98&qid=1682450029&s=merchant-items&sr=1-1

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ePlumbing Products	A2X47XEJ723O8W	B077PN9X47	https://www.amazon.com/Elkay-Wall-Mount-Pedestal-Fountain-Refilling/dp/B077PN9X47/ref=sr_1_1?keywords=Elkay&m=A2X47XEJ723O8W&qid=1682530597&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.17f26c18-b61b-4ce9-8a28-de351f41cffb&th=1
Integrity Sales LLC	A2F2QAEDYJN1F6	B00AM1WZE6	https://www.amazon.com/Faucet-Metering-Push-NPT-0-5/dp/B00AM1WZE6/ref=sr_1_1?keywords=zurn&m=A2F2QAEDYJN1F6&qid=1682450111&s=merchant-items&sr=1-1
TwinRiver	A2SWBNPJRG4R XF	B001U6IO88	https://www.amazon.com/Zurn-Z7100-SS-LH-Single-Pressure-Balancing/dp/B001U6IO88/ref=sr_1_1?keywords=zurn&m=A2SWBNPJRG4R XF&qid=1682450207&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.f5122f16-c3e8-4386-bf32-63e904010ad0
KASA Shop	A1UP1VQO268BGZ	B075TH3J71	https://www.amazon.com/Elkay-LKQS35GR-Polymer-Removable-Strainer/dp/B075TH3J71/ref=sr_1_1?keywords=Elkay&m=A1UP1VQO268BGZ&qid=1682530676&s=merchant-items&sr=1-1&th=1
Team FTO Store	A1CN8B8GKORY9I		
Box Stop	A2BYCTIVJ1S3UY	B0874TFQ99	https://www.amazon.com/Zurn-ZERK-U-WS1-TM-AquaSense-flush-valves-Chrome/dp/B0874TFQ99/ref=sr_1_1?keywords=zurn&m=A2BYCTIVJ1S3UY&qid=1682451615&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.f5122f16-c3e8-4386-bf32-63e904010ad0
WC Supply Co.	A20WFZR9RE2OEG	B00IPU9OHW	https://www.amazon.com/Zurn-Wilkins-12UFX12F-700XL-Check-Outlet/dp/B00IPU9OHW/ref=sr_1_2?keyword

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			s=zurn&m=A20WFZR9RE2OEG&qid=1682451688&s=merchant-items&sr=1-2
regina luxury supply	A27C4QOG1VPFHW	B09GTGFLBH	https://www.amazon.com/Zurn-AquaSense%C2%AE-Touchless-Aerator-Widespread/dp/B09GTGFLBH/ref=sr_1_1?keywords=zurn&m=A27C4QOG1VPFHW&qid=1682451758&s=merchant-items&sr=1-1&th=1
Onestopshopb h	A1EZB4LHAX1QKL	B005TU50GA	https://www.amazon.com/Zurn-2-SXL-Lead-Free-Screen-Strainer/dp/B005TU50GA/ref=sr_1_1?keywords=zurn&m=A1EZB4LHAX1QKL&qid=1682451827&s=merchant-items&sr=1-1
Thrifty but Nifty KMCO	A1PN5IVWHXFK39	B009GPW1YS	https://www.amazon.com/Zurn-Z83600-XL-Bubbler/dp/B009GPW1YS/ref=sr_1_1?keywords=zurn&m=A1PN5IVWHXFK39&qid=1682451937&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.f5122f16-c3e8-4386-bf32-63e904010ad0
Southern Connect	A3O81UJWY0Y7KJ	B002SSIDVU	https://www.amazon.com/Zurn-QCRT4CM-Medium-Crimp-Metal/dp/B002SSIDVU/ref=sr_1_1?keywords=zurn&m=A3O81UJWY0Y7KJ&qid=1682452001&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.f5122f16-c3e8-4386-bf32-63e904010ad0
AMZFASTSHOP	A218B2CWLO2ZCT	B06W9F66HP	https://www.amazon.com/Elkay-Quartz-Classic-ELG1616WHO-Single/dp/B06W9F66HP/ref=sr_1_1?keywords=Elkay&m=A218B2CWLO2ZCT&qid=1682946607&s=merchant-items&sr=1-1
Simply Everything For You	A2IHTM6R84VZVD		

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PCC Discount	A23ZJ91ELXESH4	B00DAS5MCA	https://www.amazon.com/Wilkins-12-375XL-Pressure-Backflow-Preventer/dp/B00DAS5MCA/ref=sr_1_1?keywords=zurn&m=A23ZJ91ELXESH4&qid=1682452164&s=merchant-items&sr=1-1&th=1
VENTURE SUPPLY	A2YJZNLU44LXD O	B00IKVMEYQ	https://www.amazon.com/Zurn-34-NR3XLDUPEX-Pressure-Reducing-Connection/dp/B00IKVMEYQ/ref=sr_1_1?keywords=zurn&m=A2YJZNLU44LXDO&qid=1682452221&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.006c50ae-5d4c-4777-9bc0-4513d670b6bc
Hearthshire	A2ENTBEZKGXKV W	B012CPZEOM	https://www.amazon.com/SharkBite-Zurn-Coupling-Barb/dp/B012CPZEOM/ref=sr_1_1?keywords=zurn&m=A2ENTBEZKGXKVW&qid=1682452310&s=merchant-items&sr=1-1
Plumbing fixtures	A1MUJJKYRHTET O		
GlovesAndStuff	A3JNRE7MU71YA H		
Tools And More (Serial # Recorded)	A11BWKX35E6H 2H	B00545A3VC	https://www.amazon.com/Zurn-ZERK-CPM-Flush-Automatic-Retrofit/dp/B00545A3VC/ref=sr_1_1?keywords=zurn&m=A11BWKX35E6H2H&qid=1682452439&s=merchant-items&sr=1-1&th=1
Triad Global Resources	A1B3T4FT5GRNJL	B009GPXCNM	https://www.amazon.com/Zurn-ZTR6200EV-Sensor-Operated-Closets/dp/B009GPXCNM/ref=sr_1_1?keywords=zurn&m=A1B3T4FT5GRNJL&qid=1682452514&s=merchant-items&sr=1-1

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GreenStar Equipment	A1HF50TSP81G79	B07B1R8X9S	https://www.amazon.com/Elkay-Classic-ELGU251912PDWHO-Undermount-Laundry/dp/B07B1R8X9S/ref=sr_1_1?keywords=Elkay&m=A1HF50TSP81G79&qid=1682530925&s=merchant-items&sr=1-1&th=1
Nowlux	A3RLXPVTFDQRWL		
Look-C-Bi	A28XO8HSJY1W7E	B07TTK13QQ	https://www.amazon.com/Zurn-34-VR10XL-Vacuum-Relief-Valve/dp/B07TTK13QQ/ref=sr_1_1?keywords=zurn&m=A28XO8HSJY1W7E&qid=1682452627&s=merchant-items&sr=1-1
Jiffy Supply	A1LNERADFIB83D		
Three-Fifteen.Inc	A2O40CR315HUAR	B0012LL56E	https://www.amazon.com/Zurn-GT2700-10-2NH-GT2700-No-Hub-Control/dp/B0012LL56E/ref=sr_1_1?keywords=zurn&m=A2O40CR315HUAR&qid=1682452701&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.c3015c4a-46bb-44b9-81a4-dc28e6d374b3
Bunji	A2PC76C72EEZTS	B00OZH3MA4	https://www.amazon.com/Zurn-ZTR6203-ULF-Sensor-Operated-Urinal/dp/B00OZH3MA4/ref=sr_1_1?keywords=zurn&m=A2PC76C72EEZTS&qid=1682452909&s=merchant-items&sr=1-1&ufe=app_do%3Aamzn1.fos.c3015c4a-46bb-44b9-81a4-dc28e6d374b3
Stroom	A3389QWC859FMI	B00GG1Q1DW	https://www.amazon.com/Zurn-1-NR3XLDUC-Lead-Free-Pressure-Reducing/dp/B00GG1Q1DW/ref=sr_1_1?keywords=zurn&m=A3389QWC859FMI&qid=1682452977&s=merchant-items&sr=1-1

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Discount Designer Home	A3PBL47050LT0Y	B009GPSM00	https://www.amazon.com/Zurn-P6000-ER15-Aquaflush-Replacement-Flow-Rings/dp/B009GPSM00/ref=sr_1_1?keywords=zurn&m=A3PBL47050LT0Y&qid=1682453053&s=merchant-items&sr=1-1
BHRT Naturals	AAQJ0LY6AXJ10	B004WEJZA6	https://www.amazon.com/Zurn-1-600XL-Wilkins-Pressure-Reducing/dp/B004WEJZA6/ref=sr_1_1?keywords=zurn&m=AAQJ0LY6AXJ10&qid=1682453111&s=merchant-items&sr=1-1&th=1
Volusia Liquidators LLC	AHVDKHEHYCLYW	B010SAFE34	https://www.amazon.com/AquaSpec-Sprayer-Assembly-female-thread/dp/B010SAFE34/ref=sr_1_1?keywords=zurn&m=AHVDKHEHYCLYW&qid=1682453181&s=merchant-items&sr=1-1
Home Essentials	AKDENCFW3A9SI	B009HEGCYI	https://www.amazon.com/Elkay-51299c-WaterSentry-Replacement-Fountains/dp/B009HEGCYI/ref=sr_1_1?keywords=Elkay&m=AKDENCFW3A9SI&qid=1682610521&s=merchant-items&sr=1-1&th=1

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